REMARKS

This is a full and timely response to the outstanding non-final Office Action mailed July 1, 2004. Upon entry of this response, claims 1-22 are pending in the application. Applicant respectfully requests that the amendments being filed herewith be entered and that there be reconsideration of all pending claims.

1.   Rejection of Claims 1-22 under 35 U.S.C. §102

Claims 1-22 have been rejected under §102(b) as allegedly anticipated by *Hobbs* (U.S. 6,523,022). Applicant respectfully traverses these rejections. A proper rejection of a claim under 35 U.S.C. §102 requires that a single prior art reference disclose each element of the claim. *See, e.g., W.L. Gore & Assoc., Inc. v. Garlock, Inc.,* 721 F.2d 1540, 220 U.S.P.Q. 303, 313 (Fed. Cir. 1983).

a. Claims 1, 8, 15, and 19

Applicant respectfully submits that *Hobbs* fails to teach, disclose or suggest at least the feature of *remote invocation of an object...on the target system* as recited in claims 1, 8, 15, and 19. Specifically, claims 1 and 8 recite "initiating a remote invocation of a user component object on the target computer system in response to the received user request. Claim 15 recites "the interface component applying the remote invocation to the user component object in response to the received user request." Finally, claim 19 recites "generating a remote invocation command responsive to the component call from the component object wrapper initiating a remote invocation of a user component object on the target computer system in response to the user request."

The Office Action makes only a general statement that the elements of Applicant's claimed invention correspond to the FIGs. 2-4, without pointing out what particular teachings of *Hobbs* correspond to which claimed elements. If the rejection is maintained in the next Office Action, Applicant respectfully requests that the Examiner point out with particularity the portion of *Hobbs* that teaches the above-described limitation.

In this response, Applicant will assume, *arguendo*, that the client 203, application server 207 and database server 211 disclosed in *Hobbs* correspond to the client system, server system, and target system, respectively. *Hobbs* teaches that "the Client 203 and the Application Server 207 interactively communicate with each other using the functionality provided by HTTP" (Col. 15, lines 44-46), and "Application Server 207 and Database Server 211 interactively communicate with each other using the functionality provided on connection 208 by the Common Gateway Interface (CGI) and HTTP via connection 208" (Col. 15, lines 59-61).

In contrast, communication between the server system and the target system in Applicant's claimed invention uses an object on the target system which is remotely invoked by a component on the server system. Applicant respectfully asserts that the teaching in *Hobbs* of HTTP and CGI between application server 207 and database server 211 is not equivalent to "remote invocation of an object…on the target system" as recited in claims 1, 8, 15, and 19.

A second embodiment described in *Hobbs* uses "non-CGI programmic server extensions such as Microsoft's Internet Server API (ISAPI), the Netscape API (NSAPI) or Microsoft's Active Server Pages (ASP)." (Col. 21, lines 45-50). It is not clear from the context whether this passage describes the client/application server interface, or the application server/database server interface. Even assuming, *arguendo*, that this description in *Hobbs* refers to communications between the application server and the database server, Applicant respectfully asserts an API is

not equivalent to "remote invocation of an object...on the target system" as recited in claims 1,

8, 15, and 19. Furthermore, as known to one of ordinary skill in the art, ASP is a technology

which generates web pages dynamically from a scripting language, and Applicant respectfully

asserts that ASP is not equivalent to "remote invocation of an object...on the target system"

either.

Hobbs also describes a third embodiment:

> [T]he CDI application may be replaced as a means to pass data by
> employing a non CGI programmic object oriented communications
> protocol such as Java Servlet API, in an application performing the
> table look-up of the ('IS') executed on the Application server, and
> have the Java Servlet API communicate data to a Java-enabled
> Database Server and Java-enabled browser." (Col. 21, lines
> 50-58).

As known to one of ordinary skill in the art, "Java Servlet API" is an API for developing

server-side components in Java. Applicant respectfully asserts that even though a Java

component running on the server system is "objected oriented," it is not equivalent to "remote

invocation of an object...on the target system" as recited in claims 1, 8, 15, and 19.

Finally, Hobbs discloses a fourth embodiment which uses "a non CGI programmic object

oriented communications protocol employing embedded applications, such as Sun Microsystems

Java applets or Microsoft's Active X." (Col. 22, lines 5-10). In this embodiment, the server

downloads applets to the client, and then the client interacts with the database server without

going through the server. (Col. 22, lines 10-20). In contrast, Applicant's invention, as defined

by claims 1, 8, 15, and 19 uses the server system to remotely invoke the object on the target

system.

For at least the reason that Hobbs fails to disclose, teach or suggest "remote invocation of

an object...on the target system," Applicant respectfully submits that Hobbs does not anticipate

claims 1, 8, 15, and 19. Therefore, Applicant requests that the Examiner's rejection of claims 1, 8, 15, and 19 be withdrawn.

b. Claim 3, 10, 16, and 20

Applicant respectfully submits that *Hobbs* fails to teach, disclose or suggest at least the feature of "wherein initiating the remote invocation corresponds to a distributed component object model communication" as recited in claims 3 and 10, or "wherein the user component object comprises a DCOM object" as recited in claims 16 and 20. The teachings of *Hobbs* that relate to the communication between application server 207 and database server 211 were discussed above in connection with claims 1, 8, 15, and 19. Applicant respectfully submits that a teaching of ISAPI, ASP, Java servlets, Java applets, and Active X components is not equivalent to either "distributed component object model communication" or a "DCOM object."

For at least the reason that *Hobbs* fails to disclose, teach or suggest these elements of claim 3, 10, 16, and 20, Applicant respectfully submits that *Hobbs* does not anticipate claim 3, 10, 16, and 20. Therefore, Applicant requests that the Examiner's rejection of claim 3, 10, 16, and 20 be withdrawn.

c. Claims 7 and 14

Applicant respectfully submits that *Hobbs* fails to teach, disclose or suggest at least the feature of "wherein...the client computer system corresponds to a business partner of the company" as recited in claims 7 and 14. Applicant can find no discussion of a "business partner" anywhere in *Hobbs*. Applicant can find only one passage in *Hobbs* discussing the relationship between the operator of the client system and the operator of the server and target systems. In that description, the server and target systems are operated by on-line search services (*e.g.*, Lexis-Nexis), and the client is operated by a customer of the on-line search

service. (Col. 14, Lines 40-55). Applicant respectfully submits that a customer is not equivalent to a business partner as recited in claims 7 and 14. For at least the reason that *Hobbs* fails to disclose, teach or suggest this element of claims 7 and 14, Applicant respectfully submits that *Hobbs* does not anticipate claims 7 and 14. Therefore, Applicant requests that the Examiner's rejection of claims 7 and 14 be withdrawn.

d. Claims 2, 4-6, 9, 11-13, 17, 18, 21, and 22

Since claims 1, 8, 15, and 19 are allowable, Applicant respectfully submits that claims 2, 4-6, 9, 11-13, 17, 18, 21, and 22 are allowable for at least the reason that each depends from an allowable claim. *In re Fine*, 837 F.2d 1071, 5 U.S.P.Q. 2d 1596, 1598 (Fed. Cir. 1988). Therefore, Applicant respectfully requests that the rejection of claims 2, 4-6, 9, 11-13, 17, 18, 21, and 22 be withdrawn.
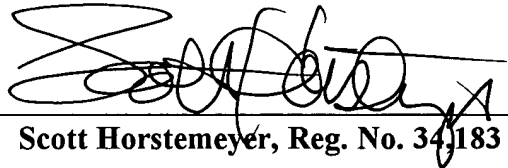
CONCLUSION

Applicant respectfully requests that all outstanding objections and rejections be

withdrawn and that this application and presently pending claims 1-22 be allowed to issue. If the

Examiner has any questions or comments regarding Applicant's response, the Examiner is

encouraged to telephone Applicant's undersigned counsel.

Respectfully submitted,

**THOMAS, KAYDEN, HORSTEMEYER
& RISLEY, L.L.P.**

By: _____
       Scott Horstemeyer, Reg. No. 34,183

100 Galleria Parkway, NW
Suite 1750
Atlanta, Georgia 30339-5948
Tel: (770) 933-9500
Fax: (770) 951-0933